EXHIBIT "B"

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

:

CIVIL ACTION NO.

04-12189-RWZ

Wolverine Proctor & Schwartz, Inc.:
and:
Great American Alliance Insurance:
Co., Inc.,

Plaintiffs and Counterclaim Defendants

v. :

XYZ Tape Corp.,
William B. Wilbur,
Defendants and
Travelers Property Casualty
Company of America,

Defendant and Counterclaimant:

Plaintiffs' Rule 26(a)(1) Initial Disclosure

Plaintiffs Wolverine Proctor & Schwartz, Inc. ("Wolverine") and Great American Alliance Insurance Co., Inc. ("Great American") offer these initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Rule 26.2(A).

A. Identity of Individuals and Information

1. Eric K. Long, 156 South Road, North Hampton, New Hampshire 03862, telephone 603-964-8635. Former applications Engineer and Product Manager for Wolverine Proctor & Schwartz, Inc., 51 East Main Street, Merrimac, Massachusetts 01860, telephne 978-346-4541. His is currently employed by The CMM Group LLC, P.O. Box 5903, De Pere, Wisconsin 54115. Mr. Long has information regarding communications to which he was a party

EPA 0001 to EPA 0003

S&W 0001 to S&W 0012

P&S 0001 to P&S 0113

DLT 0001 to DLT 0042

DEM 0001 to DEM 0213

WILB 0001 to WILB 0569

Transcripts of Depositions of Palmer & Sicard (Day 1); Thomas Ludwig; Andrew Fardy, Ken Souza, Louis Toro (Day 1); William Wilbur (Day 1); Wolverine Proctor & Swartz, Inc. (by Eric Long, David McAfee, Todd Dudley); and Deposition Exhibits T vs. W. 1 to 250.

Computation of Damages and Supporting Evidence C.

In accordance with the Court's order at the Local Rule 16.1 Scheduling Conference see the attached.

D. Insurance Agreements

Not applicable. (A copy of the insurance agreement between Wolverine and Great American is available for inspection and copying.)

> WOLVERINE PROCTOR & SCHWARTZ, INC. by its attorneys,

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon (each party appearing pro sc and) the attorney of record for each other party by mail (by hand) on 2-3-05 party by mail (by hand) on_

Two Center Plaza, Suite 620

Matthew J. Walko (BBO #562172)

Boston, MA 02108-1906

Smith & Duggan LLP

(617) 228-4400

Dated: February 3, 2005

Wolverine Proctor Schwartz, Inc. v. XYZ Tape Corp.
U. S. District Court, D. Mass.,
C.A. No. 04-12189-RWZ
Initial Disclosure Fed. R. Civ. P. 26(a)(1)(C)
As Modified By Court Order

11/01/02 through 12/31/02 \$399.00 01/01/03 through 02/28/03 \$4,045.24 03/01/03 through 04/30/03 \$20,105.44 05/01/03 through 07/30/03 \$17,486.72 07/01/03 through 08/18/03 \$6,649.35 08/01/03 through 08/18/03 \$6,319.36 08/19/03 through 09/09/03 \$4,107.56 09/01/03 through 09/16/03 \$8,600.00 09/17/03 through 09/30/03 \$7,570.45 09/24/03 through 09/30/03 \$7,570.45 09/24/03 through 10/06/03 \$7,454.21 10/07/03 through 10/06/03 \$6,392.83 10/01/03 through 10/09/03 \$6,368.48 10/10/33 through 10/13/03 \$6,513.63 10/14/03 through 10/15/03 \$6,799.98 10/16/03 through 10/15/03 \$6,799.98 10/25/03 through 10/20/03 \$6,820.67 10/21/03 through 10/31/03 \$5,550.98 10/25/03 through 11/05/03 \$5,182.17 11/06/03 through 11/12/03 \$5,701.35 11/13/03 through 11/12/03 \$5,701.35 11/13/03 through 11/12/03 \$5,701.35 11/13/03 through 11/12/03 \$5,50.99 12/17/03 through 12/17/03 \$4,519.99 12/17/03 through 12/31/03 \$5,454.72 01/01/04 through 01/05/04 \$6,954.24 01/06/04 through 01/05/04 \$6,954.24 01/06/04 through 01/13/04 \$5,447.00 01/14/04 through 01/19/04 \$5,787.00 01/120/04 through 01/12/04 \$9,167.80 01/120/04 through 01/12/04 \$9,167.80 01/120/04 through 01/21/04 \$9,167.80 01/120/04 through 01/22/04 \$7,497.60 03/01/04 through 07/28/04 \$4,294.00 07/29/04 through 07/28/04 \$4,294.00 07/29/04 through 07/28/04 \$5,046.00 09/23/04 through 07/28/04 \$5,046.00 09/23/04 through 09/22/04 \$5,046.00 09/23/04 through 10/15/04 \$4,495.00 01/16/04 through 10/15/04 \$4,495.00 01/16/04 through 10/15/04 \$5,954.47 11/01/04 through 10/15/04 \$5,954.47 11/01/04 through 10/15/04 \$6,036.54 Subtotal	Smith & Duggan LLP Invoice	Total
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12/01/01 through 12/31/04 \$6,036.54	-	\$5,954.47
	_	\$2,542.00
Subtotal \$271,795.47	-	
	Subtotal	\$271,795.47

Wolverine Proctor Schwartz, Inc. v. XYZ Tape Corp.
U. S. District Court, D. Mass.,
C.A. No. 04-12189-RWZ
Initial Disclosure Fed. R. Civ. P. 26(a)(1)(C)
As Modified By Court Order

Off-S&D-Invoice Expenses

(est.)

\$9,842.35

Non-Testifying Expert Fred

Kern of CCA

\$6,290.32

Electrical Expert Andrew

Diamond of Exponent Inc.

\$6,360.48

Chemical Engineering and Fire Cause and Origin Expert Donald Hoffman of Safety

Engineering, Inc.

\$11,680.13

Total

\$305,968.75